

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

THE BOYD LAW GROUP, L.C.,	)	
	)	
Plaintiffs,	)	Case No. 12-CV-01744
	)	
v.	)	
	)	
SAINT LOUIS COUNTY, MISSOURI.	)	
	)	
Defendants.	)	
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**PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**

Plaintiff, by and through its attorney, hereby requests leave of Court to file its First Amended Complaint. In support of its request, Plaintiff states the following:

1. That subsequent to the filing of its Complaint herein, the ordinance in question (Ordinance No. 25,190) was substituted and amended by Ordinance No. 25,239.
2. That the amended Ordinance No. 25,239 is substantially the same as the preceding Ordinance and contains the same language that Plaintiff alleges is unconstitutional.
3. However, it is necessary to amend the Complaint in order to determine the constitutionality of the substituted and amended Ordinance No. 25,239.
4. Plaintiff is desirous to include additional claims to support its declaration that the ordinance is unconstitutional.

WHEREFORE, Plaintiff prays that the Court grant its motion and all Plaintiff leave to amend its Complaint and for such other relief the Court finds just and proper.

Respectfully Submitted By:

THE BOYD LAW GROUP, L.C.

s/Michael E. Boyd  
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ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 21st day of November, 2012, I mailed the foregoing US First Class Mail and sent electronically to the following:

Michael A. Shuman  
Associate County Counselor  
Lawrence K. Roos Bldg.  
41 So. Central Avenue  
Clayton, MO. 63105

s/Michael E. Boyd